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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re

Case No.: 2:21-bk-18205-DS

CRESTLLOYD, LLC,

Chapter No.: 11

Debtor and Debtor-in-Possession

OBJECTION TO EX PARTE MOTION FOR FINAL DECREE

[No hearing set]

1 Crestlloyd, LLC, the debtor and debtor in possession herein (the “Debtor”), hereby files
2 its Objection to the Ex Parte Motion for Final Decree (“Motion”) filed by Edward Schwagerl as
3 Docket No. 429.

4 Based on the review of the pleading, it is not clear what the Motion requests. However,
5 to the extent the Motion asserts that final decree should be entered pursuant to Rule 3022 of the
6 Federal Rules of Bankruptcy Procedure, there is no basis to consider or grant such request for,
7 at a minimum, the following reasons:

- 8 1. Mr. Schwagerl is not a party in interest and, therefore, lacks standing to seek such
9 relief; and
- 10 2. The Debtor’s estate has not been fully administered as evidenced by the substantial
11 litigation pending among the Debtor and its secured creditors.

12 Wherefore, the Debtor respectfully requests that the Court deny the Motion in its entirety.

13 Dated: October 7, 2022

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

15 By: /s/ David B. Golubchik
16 DAVID B. GOLUBCHIK
17 TODD M. ARNOLD
18 JONATHAN D. GOTTLIEB
19 LEVENE, NEALE, BENDER,
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21 Attorneys for Crestlloyd, LLC

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **OBJECTION TO EX PARTE MOTION FOR FINAL DECREE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 7, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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- Genevieve G Weiner gweiner@sidley.com, laefilingnotice@sidley.com; genevieve-weiner-0813@ecf.pacerpro.com
 - Jessica Wellington jwellington@bg.law, ecf@bg.law

2. SERVED BY UNITED STATES MAIL: On October 7, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

6 | *None.*

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **October 7, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

12 | *None.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

15 October 7, 2022 Stephanie Reichert /s/ Stephanie Reichert
Date Type Name Signature